

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THOMAS E. SPRINGER, in his capacity as
Trustee of the Chapter 7 Bankruptcy Estate of
Rocio Herrera-Nevarez,

Plaintiff,

v.

ETHICON, INC. and JOHNSON &
JOHNSON,

Defendants.

Case No. 1:17-cv-03930
Honorable Matthew F. Kennelly

**DEFENDANTS ETHICON, INC. AND JOHNSON & JOHNSON'S
OMNIBUS MOTION *IN LIMINE***

Defendants Ethicon, Inc. and Johnson & Johnson (collectively referred to as “Ethicon”) respectfully move this Court for an *in limine* order excluding from trial certain evidence, testimony, and argument, as explained in more detail in Ethicon’s Memorandum in Support of its Omnibus Motion *in Limine*. Ethicon incorporates by reference its Memorandum in Support and the exhibits that are attached to this Motion.

Ethicon requests that its Motion be granted and for any other relief the Court deems appropriate.

Dated: July 19, 2017

Respectfully submitted,

/s/ Tarek Ismail

Tarek Ismail
GOLDMAN ISMAIL TOMASELLI
BRENNAN & BAUM LLP
564 West Randolph Street, Suite 400
Chicago, IL 60661
Telephone: 312.881.5970
tismail@goldmanismail.com

/s/ Sherry A. Knutson

Sherry A. Knutson
TUCKER ELLIS LLP
233 South Wacker Drive, Suite 6950
Chicago, IL 60606-9997
Telephone: 312.624.6300
sherry.knutson@tuckerellis.com

Jennifer L. Steinmetz
Charissa N. Walker
TUCKER ELLIS LLP
950 Main Avenue, Suite 1100
Cleveland, OH 44113-7213
Telephone: 216.592-5000
jennifer.steinmetz@tuckerellis.com
charissa.walker@tuckerellis.com

Counsel for Defendants
Ethicon, Inc. and Johnson & Johnson

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 19, 2017, a copy of the foregoing was filed electronically via the Court's CM/ECF system, which will have sent notice to the attorneys of record in this matter.

/s/ Sherry A. Knutson

Sherry A. Knutson

*One of the Attorneys for Defendants
Ethicon, Inc. and Johnson & Johnson*